**BILL RICHARDSON**
Governor

**DIANE DENISH**
Lieutenant Governor

**New Mexico**
***ENVIRONMENT DEPARTMENT***
***Air Quality Bureau***
1301 Siler Road, Building B
Santa Fe, NM 87507
Phone (505) 476-4300
Fax (505) 476-4375
*www.nmenv.state.nm.us*

**RON CURRY**
Secretary

**JON GOLDSTEIN**
Deputy Secretary

December 29, 2008

Ms. Nancy Norem
Public Service Company of New Mexico
2401 Aztec Road NE
MS-Z110
Albuquerque, New Mexico 87107

Subject: Additional Information Request for San Juan Generating Station BART Analysis

Dear Nancy,

This letter is in response to Public Service Company of New Mexico's (PNM) information submittal of November 21, 2008 regarding the SO3 emissions used in the BART analysis. The Department has reviewed the submittal and we have one remaining question regarding the control of SO3 emissions.

In your response to why PNM does not account for any SO3 control, you provide the following justification for not calculating inherent SO3 removal:

> "Specific details on the NPS calculations and assumptions, including if these emission factors considered removal of condensable sulfates (i.e., removal on air heater surfaces, in air heater ash and ammonium bisulfate (ABS) deposits, in the particulate control devices, and in the FGD slurry) or to what extent, were not reviewed as this is not necessary in order to use the NPS calculation methodology for particulate speciation."

The Department agrees that further consideration of condensable sulfate removal efficiency is not required for particulate speciation when the NPS methodology is used. However, this is a different issue than removal of SO3. No attempt has been made to calculate SO3 removal from the additional SO3 emissions, so our original question has not been addressed.

As indicated in our last request for additional information, there is inherent SO3 removal in the form of condensate on air heater surfaces, in air heater ash and ABS deposits, in the particulate control devices, and in the FGD slurry and no attempt has been made to characterize or quantify the removal of SO3 from downstream equipment. Please note that the Department's review of other state's BART analyses show this inherent removal has been calculated.

Per Table 2.3: Additional Individual Maximum Allowable Emission Rates for Each Boiler of NSR Permit 0063M6R1 for the San Juan Generating Facility, a 90% removal efficiency is required for SO2 emissions after the effective dates of Condition 1.g. Unless PNM justifies an alternative removal efficiency for the SO3 emissions, the Department will rely on the SO2 removal efficiency in NSR Permit 0063M6R1 to quantify additional SO3 removal rates for the BART analysis. Please respond by January 23, 2009 to let me know if PNM will calculate and provide a basis for an alternative removal efficiency for SO3.

Sincerely,

Elizabeth Bisbey-Kuehn
Air Quality Bureau
NMED